

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GERALD V. RITCHIE	:	CIVIL ACTION
Plaintiff	:	
	:	
vs.	:	No. 17-cv-02637
	:	
BRIAN MATHIEU	:	
and	:	
PV HOLDING CORP.	:	
Defendants	:	JURY TRIAL DEMANDED


**PLAINTIFF'S RESPONSES TO AFFIRMATIVE
DEFENSES OF PV HOLDING CORP.**

FIRST THROUGH TWENTIETH AFFIRMATIVE DEFENSES

Denied. The averments in these paragraphs are denied as conclusions of law to which no further response is required. However, to the extent that said averments are deemed factual, then the same are denied and deemed at issue and strict proof thereof will be demanded at the time of trial.

WHEREFORE, plaintiff demands judgment in his favor and that the affirmative defenses of PV Holding Corp. be dismissed.

BY: _____


~~GUY N. PAOLINO, ESQUIRE~~
Attorney for Plaintiff, Gerald V. Ritchie
Attorney I.D. No. 41051
FORBES, BENDER, PAOLINO & DiSANTI, P.C.
205 North Monroe Street
Media, PA 19063
(610) 627-1700

VERIFICATION

Guy N. Paolino, Esquire, Attorney for Plaintiff, Gerald V. Ritchie, states he is acquainted with the facts contained in the foregoing Plaintiff's Responses to Affirmative Defenses of Defendant, PV Holding Corp.; that the same are true and correct to the best of his information, knowledge and belief and that this statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities

BY:

A handwritten signature in black ink, appearing to read "Guy N. Paolino", is written over a horizontal line. The signature is stylized with a large loop at the end.

GUY N. PAOLINO, ESQUIRE
Attorney for Plaintiff, Gerald V. Ritchie
Attorney I.D. No. 41051
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of June, 2017, a true and correct copy of Plaintiff's Response to Affirmative Defenses of Defendant, PV Holding Corp. was electronically filed with the Clerk of the United States District Court for the Eastern District of Pennsylvania, and electronically served upon the following counsel of record:

James E. Egbert, Esquire
Egbert & Barnes, P.C.
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Abington, PA 19001
**Attorney for Defendant,
PV Holding Corp.**

Matthew D. Garson, Esquire
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**Attorney for Defendant,
Brian Mathieu**

BY:


GUY N. PAOLINO, ESQUIRE

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